From:	Pena, Yvonne M
To:	Reynolds, John; "christine.harada@cpuc.ca.gov"
Cc:	Miranda, Hazel C.; "adam.buchholz@cpuc.ca.gov"; Stone, Lindsey M; Sidhar, Shivani N; Peters, Dennis C
Subject:	A.24-06-001 SDG&E ERRA - Written Ex Parte
Date:	Friday, April 24, 2026 4:19:00 PM
Attachments:	SDGE ERRA _Written Ex Parte_A.24-06-001.pdf

Sent on Behalf of Shivani Sidhar – SDG&E and SoCalGas Vice President, Regulatory Affairs

Good afternoon President Reynolds and Commissioner Harada,

Enclosed for your consideration is a written ex parte for in SDG&E's Energy Resource Recovery Account (ERRA) Compliance for Record Year 2023. This proceeding is currently on the agenda for the April 30, 2026 CPUC voting meeting as Item 3.

This will be notified on the A.24-06-001 service list and filed accordingly pursuant to Rule 8.4 of the Rules of Practice and Procedure.

Sincerely,

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April 24, 2026

President John Reynolds
Commissioner Christine Harada
California Public Utilities Company
505 Van Ness Ave
San Francisco, CA 94102

On April 22, 2026, a revised Proposed Decision (Revised PD) was issued in A.24-06-001, the Application of San Diego Gas & Electric Company (SDG&E) for Approval of Energy Resource Recovery Account Compliance for Record Period 2023 (ERRA Compliance). The original PD in this proceeding was issued on February 13, 2026 (Original PD). The Revised PD removes all findings of fact, conclusions of law, and ordering paragraphs regarding SDG&E's stranded costs from the Green Tariff Shared Renewables (GTSR) program and instead finds that "there is insufficient record for the Commission to determine which source or sources should be responsible for the outstanding GTSR costs."[1]

Public Utilities Code (PUC) § 1701.3(h)(4) provides that "[w]ritten ex parte communications by an interested person shall be permitted at any time without restriction before the three business days before the commission's scheduled vote on a decision if copies of the communication are transmitted to all parties on the same day as the original communication." SDG&E hereby submits this written ex parte communication pursuant to PUC § 1701.3(h)(4).

The Original PD correctly found that SDG&E could recover stranded costs from the GTSR program from all ratepayers via the Public Purpose Program (PPP) rate. This decision was based on the Original PD's findings, supported by record evidence, that SDG&E created and administered its GTSR program consistent with statute and Commission direction; that SDG&E did not mismanage the GTSR program; and that structural challenges inherent in the design of the program ultimately caused the stranded costs at issue.[2] The Original PD determined that it

[1] Revised PD, at 14.
[2] Original PD, p. 23, Findings of Fact (FOF) 2, 3, & 4.\

would be unreasonable to recover the stranded costs from past program participants, as customers who previously participated in the GTSR program had no reason to expect that participation in the program carried the risk of a large bill nearly a decade after leaving the program. [3]The Original PD further found that PUC section 2833(q) does not prohibit the Commission from authorizing SDG&E to recover the program's stranded costs from all ratepayers via the PPP and concluded that allowing SDG&E to recover these costs from all ratepayers is reasonable.[4]

Without explanation, the Revised PD deletes not only the conclusion allowing SDG&E to recover the stranded GTSR costs from all customers via the PPP but also all of the factual findings related to the proper creation, administration, and inherent challenges of the GTSR program. The Original PD's findings on these issues followed thorough briefing by the parties and were amply supported by the record in the proceeding. The Revised PD fails to justify the deletion of these findings or explain how or why it now finds the record to be "insufficient." The reasonableness of the costs at issue was fully litigated in this proceeding by motivated interested parties and there is no reason to believe that additional litigation will yield new evidence.

As detailed in SDG&E's Reply Comments on the Original PD, the Original PD properly rejected the arguments San Diego Community Power and Clean Energy Alliance (the SD CCAs) advanced throughout the proceeding, and again in their March 4, 2026 ex parte meeting, that SDG&E mismanaged the GTSR program by setting rates below program costs, that SDG&E acted unreasonably by delaying recovery of the GTSR under collections, and that PUC Section 2822(q) prohibits recovery of stranded GTSR costs from all ratepayers. The SD CCAs have not presented any evidence that would undermine the Original PD's well-reasoned and supported findings.

SDG&E therefore requests that the Commission reinstate the Original PD in this proceeding.

Respectfully submitted,

By: <u>*/s/ Shivani Sidhar*</u>

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[3] Original PD, pp. 13 & 23, FOF 5.
[4] Original PD, pp. 14 & 23, FOF 6 and Conclusion of Law 4.